

DRUANNE D. WHITE
druanne@wdwlawfirm.com

JOY C. DAVIS
joy@wdwlawfirm.com

TREVOR WHITE
trevor@wdwlawfirm.com



WHITE DAVIS & WHITE
LAW FIRM

209 East Calhoun Street • PO Box 1346 • Anderson, South Carolina 29622
Telephone (864) 231-8090 • Fax (864) 231-8006
www.wdwlawfirm.com

ASHLEA M. WHITE
ashlea@wdwlawfirm.com

KYLE J. WHITE
kyle@wdwlawfirm.com

TRAVIS W. WHITE
travis@wdwlawfirm.com

August 20, 2018

United States Postal Service Regular Mail and Electronic Mail

Elloree A. Ganes
Hood Law Firm, LLC
Post Office Box 1508
Charleston, SC 29402-1508
elloree.ganes@hoodlaw.com

James W. Clement
Hood Law Firm, LLC
Post Office Box 1508
Charleston, SC 29402-1508
jim.clement@hoodlaw.com

Re: Wendy Iacobucci vs. Town of Bonneau, Bonneau Police Department and Franco Fuda,
Civil Action No.: 2:18-CV-00152-DCN-BM

Dear Elloree & Jim:

Enclosed please find the Second Amended Subpoena and Second Amended Notice to Take Video Deposition of Liz Wrenn, the Third Amended Subpoena and Third Amended Notice to Take Video Deposition of Rembert E. Wrenn, and the Amended Subpoena and Amended Notice to Take the Video Deposition of Brian Batterton, along with a Certificate of Service. The subpoenas will be served on the witnesses via certified mail. If you have any questions, please feel free to give me a call.

Sincerely,

Kyle J. White

KJW/dm
Enclosures
cc: Samuel R. Clawson, Jr., Esq.
Christy R. Fagnoli, Esq.

STATE OF SOUTH CAROLINAISSUED BY THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Wendy Iacobucci, Plaintiff,

v.

SUBPOENA IN A CIVIL CASE

Town of Bonneau et al

Case Number: 2:18-CV-00152-DCN-BM

TO: Brian Batterton, 4640 Dallas Hwy, Powder Springs, GA 30127☐ YOU ARE COMMANDED to appear in the above-named court at the place, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME , AM

☒ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION 4640 Dallas Hwy Powder Springs, GA 30127	DATE AND TIME September 13, 2018, 11:00 AM
--	--

☐ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects in your possession, custody or control at the place, date and time specified below (list documents of objects):

PLACE	DATE AND TIME at AM

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME , AM
----------	--------------------

ANY SUBPOENAED ORGANIZATION NOT A PARTY TO THIS IS HEREBY DIRECTED TO RULE 30(b)(6), SOUTH CAROLINA RULES OF CIVIL PROCEDURE, TO FILE A DESIGNATION WITH THE COURT SPECIFYING ONE OR MORE OFFICERS, DIRECTORS, OR MANAGING AGENTS, OR OTHER PERSONS WHO CONSENT TO TESTIFY ON ITS BEHALF, SHALL SET FORTH, FOR EACH PERSON DESIGNATED, THE MATTERS ON WHICH HE WILL TESTIFY OR PRODUCE DOCUMENTS OR THINGS. THE PERSON SO DESIGNATED TESTIFY AS TO MATTERS KNOWN OR REASONABLY AVAILABLE TO THE ORGANIZATION

I CERTIFY THAT THE SUBPOENA IS ISSUED IN COMPLIANCE WITH RULE 45(c)(1), AND THAT NOTICE AS REQUIRED BY RULE 45(b)(1) HAS BEEN GIVEN TO ALL PARTIES.



August 20, 2018

Kyle J. White, Esquire, Attorney for Plaintiff(s)

Attorney/Issuing Officer's Signature
Indicate if Attorney for Plaintiff or Defendant

Date

Print Name

Attorney's Address and Telephone Number :

WHITE, DAVIS & WHITE LAW FIRM, PA., P.O. BOX 1346, ANDERSON, SC 29622; PHONE: (864) 231-8006

Clerk of Court/Issuing Officer's Signature

Date

Print Name

Pro Se Litigant's Name, Address and Telephone Number :

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Wendy Iacobucci,

Plaintiff,

vs.

Town of Bonneau, Bonneau Police
Department and Franco Fuda

Defendants.

**AMENDED
NOTICE TO TAKE VIDEO
DEPOSITION OF BRIAN BATTERTON**

2:18-CV-00152-DCN-BM

**TO: ELLOREE A. GANES AND JAMES W. CLEMENT, ATTORNEYS FOR
DEFENDANTS**

PLEASE TAKE NOTICE that the undersigned attorneys for the Plaintiff, Wendy Iacobucci, will take, or a cause to be taken the deposition of the *Brian Batterton* upon oral examination at the law offices of *4640 Dallas Highway, Powder Springs, GA, 30127* on Thursday, September 13, 2018 beginning at 11:00 a.m.

In accordance with Rule 30 of the South Carolina Rules of Civil Procedure, the deposition will be taken before a notary public or some other person duly authorized by law to take depositions and will be recorded stenographically and audio-visual (videographed).

The deposition will continue from day to day until completed. You are hereby notified to appear and take such part in the examination as you may be advised and shall be fit and proper.

(signature on next page)

August 20, 2018

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Kyle J. White', is written over a horizontal line.

Kyle J. White, (Fed. ID No. 11774)
White, Davis and White Law Firm
209 East Calhoun Street
Anderson, SC 29621
(864) 231-8090
(864) 231-8006 (Facsimile)
kyle@wdwlawfirm.com

Attorneys for the Plaintiff

Samuel R. Clawson, Jr., Esquire
Christy R. Fagnoli, Esquire
Clawson & Fagnoli, LLC
474 King Street, Ste. D.
Charleston, SC 29403
(843) 970-2700
(843) 970-1780 (Facsimile)
sam@clawsonfagnoli.com
christy@clawsonfagnoli.com

Attorneys for the Plaintiff


IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Wendy Iacobucci,)	
)	
Plaintiff,)	
)	
)	CERTIFICATE OF SERVICE
Vs.)	
)	2:18-CV-00152-DCN-BM
Town of Bonneau, Bonneau Police)	
Department and Franco Fuda,)	
)	
)	
Defendants.)	

The undersigned certifies that on the 20th day of August 2018, she served the Second Amended Subpoena and Second Amended Notice to Take Video Deposition of Liz Wrenn, the Third Amended Subpoena and Third Amended Notice to Take Video Deposition of Rembert E. Wrenn, and the Amended Subpoena and Amended Notice to Take the Video Deposition of Brian Batterton, along with a Certificate of Service via the United States Postal Service and Electronic Mail as follows:

Elloree A. Ganes
Hood Law Firm, LLC
Post Office Box 1508
Charleston, SC 29402-1508
elloree.ganes@hoodlaw.com

James W. Clement
Hood Law Firm, LLC
Post Office Box 1508
Charleston, SC 29402-1508
jim.clement@hoodlaw.com



Dana M. McBride

DRUANNE D. WHITE
druanne@wdwlawfirm.com

JOY C. DAVIS
joy@wdwlawfirm.com

TREVOR WHITE
trevor@wdwlawfirm.com



WHITE DAVIS & WHITE
LAW FIRM

209 East Calhoun Street • PO Box 1346 • Anderson, South Carolina 29622
Telephone (864) 231-8090 • Fax (864) 231-8006
www.wdwlawfirm.com

ASHLEA M. WHITE
ashlea@wdwlawfirm.com

KYLE J. WHITE
kyle@wdwlawfirm.com

TRAVIS W. WHITE
travis@wdwlawfirm.com

August 20, 2018

Via Certified Mail

Brian Batterton
4640 Dallas Highway
Powder Springs, GA 30127

Re: Wendy Iacobucci vs. Town of Bonneau, Bonneau Police Department and Franco Fuda,
Civil Action No.: 2:18-CV-00152-DCN-BM

Dear Mr. Batterton:

Enclosed please find a subpoena requiring your attendance for a deposition that is scheduled for September 13, 2018 at 11:00 a.m.

Sincerely,

Kyle J. White

KJW/dm

Enclosure

cc: Samuel R. Clawson, Jr., Esq. *(Via Electronic Mail Only)*
Christy R. Fagnoli, Esq. *(Via Electronic Mail Only)*
Elloree A. Ganes, Esq. *(Via Electronic Mail Only)*
James W. Clement, Esq. *(Via Electronic Mail Only)*

STATE OF SOUTH CAROLINA

ISSUED BY THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Wendy Iacobucci, Plaintiff,

v.

SUBPOENA IN A CIVIL CASE

Town of Bonneau et al

Case Number: 2:18-CV-00152-DCN-BM

TO: Brian Batterton, 4640 Dallas Hwy, Powder Springs, GA 30127

☐ YOU ARE COMMANDED to appear in the above-named court at the place, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME , AM

☒ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION 4640 Dallas Hwy Powder Springs, GA 30127	DATE AND TIME September 13, 2018, 11:00 AM
--	--

☐ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects in your possession, custody or control at the place, date and time specified below (list documents of objects):

PLACE	DATE AND TIME at AM

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME , AM

ANY SUBPOENAED ORGANIZATION NOT A PARTY TO THIS IS HEREBY DIRECTED TO RULE 30(b)(6), SOUTH CAROLINA RULES OF CIVIL PROCEDURE, TO FILE A DESIGNATION WITH THE COURT SPECIFYING ONE OR MORE OFFICERS, DIRECTORS, OR MANAGING AGENTS, OR OTHER PERSONS WHO CONSENT TO TESTIFY ON ITS BEHALF, SHALL SET FORTH, FOR EACH PERSON DESIGNATED, THE MATTERS ON WHICH HE WILL TESTIFY OR PRODUCE DOCUMENTS OR THINGS. THE PERSON SO DESIGNATED TESTIFY AS TO MATTERS KNOWN OR REASONABLY AVAILABLE TO THE ORGANIZATION

I CERTIFY THAT THE SUBPOENA IS ISSUED IN COMPLIANCE WITH RULE 45(c)(1), AND THAT NOTICE AS REQUIRED BY RULE 45(b)(1) HAS BEEN GIVEN TO ALL PARTIES.



August 20, 2018

Kyle J. White, Esquire, Attorney for Plaintiff(s)

Attorney/Issuing Officer's Signature

Date

Print Name

Indicate if Attorney for Plaintiff or Defendant

Attorney's Address and Telephone Number :

WHITE, DAVIS & WHITE LAW FIRM, PA., P.O. BOX 1346, ANDERSON, SC 29622; PHONE: (864) 231-8006

Clerk of Court/Issuing Officer's Signature

Date

Print Name

Pro Se Litigant's Name, Address and Telephone Number :